



**Sunoco, Inc.**  
Margaret & Bermuda Streets  
Philadelphia PA 19137-1193  
215 533 3000

Martin Matlin (3LC70)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Via Certified Mail No. 7007 0710 0000 3856 5818

Re: Response to USEPA Request for Information Dated 24 May 2011  
Sunoco, Inc.  
EPA ID No. PAD002312791  
**Reference Number: C11-020**

Dear Mr. Matlin:

Sunoco, Inc. (Sunoco) is supplying the following information in response to USEPA's letter dated May 24, 2011. In brief, that correspondence requested additional information and clarification related to issues from the September 28 and 29, 2010 U.S. Environmental Protection Agency (USEPA) inspection of this facility.

This letter is organized by presenting the exact text (shown in italics) and numbering sequence used in USEPA's May 24, 2011 correspondence, followed by Sunoco's response. All supporting documents are referenced by consecutive attachment numbers formatted with a number and letter. The number references the initial USEPA questions and the letters are used consecutively for the specific question.

***1. At the time of the inspection, the containment area for Permitted Storage Pad A appeared to show flaking and cracking (see Photograph 19 of the report). Regarding this pad, please describe:***

***a. When the pad began cracking/flaking***

For clarification, Sunoco acknowledges that there was cracking and flaking for the *surface coating* on the waste storage pad. However, the integrity of the overall concrete pad remains excellent. Per text from this facility's Part B permit, "the concrete storage area base was designed to have a minimum seven-inch thickness and a compressive strength of 3,500 psi, and was designed to be essentially impervious." Over the years since the installation of the pad, minor stress cracks have developed on occasion in the pad. In all cases, the cracks have been

routed out at the surface, and filled with flexible sealer. At the time of the USEPA RCRA inspection the surface coating was flaking; however, there were no pad cracks or gaps that appeared capable of allowing liquids to leak or seep to subsurface media.

Sunoco has no records or other documentation demonstrating exactly when the surface coating began to show cracking or flaking.

***b. If the pad has been repaired since the date of the inspection: state the date of completion of the repairs, a description of the work done, and the costs associated with the repairs***

A work order request was submitted on September 8, 2010 (prior to the inspection) requesting that the on-site planning department address the surface flaking by contracting a company to "reseal and repaint" the waste storage pad. A copy of the work order routing document (Work Order RT025094) is included as Attachment 1A.

On October 21, 2010, Sunoco issued a purchase order to Service Painting Inc. to "Blast clean, resurface, and seal the drum park". The complete cleaning and recoating of the drum pad was accomplished between approximately October 31 and November 8, 2010. On November 11, 2010, Sunoco was invoiced \$14,000 for the recoating project. Service Painting's November 11 invoice notes the project is 100% complete. Copies of Sunoco's purchase order for the work, as well as a copy of the final invoice are included as Attachment 1B.

The pad is coated with two layers of Sherman Williams COR-COTE® VEN GF (a cut sheet for the product is included as Attachment 1C). The first layer is applied directly to cleaned and properly prepared concrete. A second coat is then applied, and sand is broadcast over the second coat's surface before the material dries. The sand provides a slip resistance coating. The surface flaking observed during the inspection was from this surface slip resistance coating containing the sand mixture. The primary first coating layer was intact.

Sunoco is aware that fork truck traffic on the containment pad is eventually destructive to the coating. On many occasions, the slip resistance coating begins to peel up, long before the base coat delaminates from the concrete. The imperfections noted in the containment pad coating were the non-slip coating flaking off and not the primary coating.

***c. If the repairs have not been completed: state the intended date of the repair work and the projected costs.***

All repairs to the drum park are complete.

- 2. There appeared to be residue found around Boiler #1, its associated piping, on a nearby bucket, and on the floor nearby (see Photos 25-29). Regarding each of these areas of residue, please provide:***

Sunoco is currently researching this finding and the associated requests for additional information. In June 2, 2011 phone and email communications between Paul Persing of this facility, and Martin Matlin of USEPA, Mr. Matlin agreed to an extension to provide select information. Sunoco will provide a complete response to this issue by July 15, 2011.

- 3. In the Quality Control Lab four 10gal red metal containers were found, all labeled as HW. Additionally, seven more red plastic containers were found, stated by the representative to contain excess samples. Please state the capacities of each of these seven plastic containers. Additionally, regarding the contents of each of these seven containers, please provide:***

***a. A detailed description of its source***

Sunoco respectfully notes that the “four 10 gal red metal containers” referenced are actually six-gallon containers (see photo included as Attachment 3A). The metal containers are satellite collection points for spent gas chromatograph (GC) vials used during in-house quality assurance analyses. Two containers are designated for spent GC vials holding phenol; two containers are designated for GC vials holding other solvents or oils associated with the manufacturing of phenol. Internal operating procedures require operators to dispose of the spent vials in the proper containers following completion of the associated analytical testing. Please note that all four containers are in good condition, clearly marked as hazardous waste, compatible with the waste being stored, and kept closed except when additional waste is added. These containers are under the control of the lab chemist working in the area – and the laboratory is staffed 24-hours per day, seven-days per week. The maximum total volume of the four cans is 24 gallons. These containers meet all requirements of the Satellite Accumulation Area regulations defined in 40 CFR 262.34(c).

Further, Sunoco has a designated individual whose job includes the weekly emptying of these cans. All vials from the six-gallon cans are consolidated in 55-gallon drums located in the drum storage park. When the 55-gallon drums are full, they are sent out as one of two designated waste streams – either “Spent GC Vials” or “Spent Phenol Vials”.

The “seven red plastic containers” are utilized as collection points to containerize excess quality-assurance samples and laboratory process chemicals, primarily including acetone,

cumene, alpha-methyl styrene, and by-products or co-products generated during the manufacturing of phenol. The mixture of chemicals is returned to the facility's onsite process stream for reuse and recycling.

Each container has a labeled capacity of five-gallons (see Attachment 3B). The entire contents of all the plastic containers are emptied into the onsite #3 Phenol Pit sump, where the liquid is *returned to the manufacturing process for reuse and recovery*. The contents of these containers are returned to the facility's process stream, "as is", and are ultimately refined to make additional product. Accordingly, pursuant to USEPA 40 CFR 261.2(e) these chemicals are not defined as a solid waste and therefore can not be considered a hazardous waste.

***b. Its date(s) of generation***

Small quantities of the chemical mixture are generated daily. Sunoco does not keep a log of specific generation dates or volumes.

***c. State whether a "waste determination" and "LDR determination" has been made for the material***

"Spent GC Vials" and "Spent Phenol Vials" are both designated hazardous waste streams and both require LDR forms when sent offsite for disposal. Both waste streams are profiled with Clean Harbors Environmental as hazardous waste. Copies of the respective profiles are included as Attachment 3C.

No "waste determinations" or "LDR determinations" are required for the solvents that are returned to the process because they are not solid wastes..

***d. If a "waste determination" and "LDR determination" has been made, state when such a determination(s) was made and the results of such determination(s)***

We maintain an electronic database demonstrating that "Spent GC Vials" and "Spent Phenol Vials" waste streams were profiled and sent offsite for disposal (with LDR determination) since 2001. Documentation prior to 2001 is not readily available.

No "waste determinations" or "LDR determinations" are required for the solvents that are returned to the process because they are not solid wastes.

- e. If the material has been determined to be “hazardous waste,” please state the specific EPA Hazardous Waste Code(s) associated with such hazardous waste. If it has been determined not to be hazardous waste, explain the reasons for such determination.*

“Spent GC Vials” carry waste codes D001, U002, and U055. “Spent Phenol Vials” carry waste codes U188.

No “waste determinations” or “LDR determinations” are required for the solvents that are returned to the process because they are not solid wastes.

- f. State whether any hazardous waste determination made for such waste was based on the generator’s knowledge of the process that generated the waste, or upon analytic results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.*

The hazardous waste determination for “Spent GC Vials” and “Spent Phenol Vials” is based on process knowledge. This facility has researched, developed the manufacturing procedures, and consistently manufactured the chemicals associated with these waste streams. The facility maintains a full-time staff of product development chemists, as well as a separate staff of quality assurance / quality control chemists. The material that ultimately comprises these waste streams is analyzed multiple times per day by state-of-the-art laboratory instrumentation for quality and consistency. Accordingly, Sunoco is qualified to make this waste determination based on process knowledge.

- g. Please state if the material has been removed and/or shipped off-site and the date of such removal and/or shipment(s). If the material has not been shipped off-site, state its current location and explain why it has not been shipped off-site.**

“Spent GC Vials” and “Spent Phenol Vials” are both sent offsite for disposal approximately every three to nine months. Attachment 3D summarizes the waste disposal events for these waste streams occurring over the last three years.

The non-hazardous spent solvents that are generated in the laboratory are not sent offsite for disposal.

- h. If the material was shipped off-site, provide copies of all bills of lading, manifests (including but not limited to hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied and/or refer to each off-site shipment of this waste.**

Attachment 3D includes copies of manifests for the last three years, when "Spent GC Vials" and "Spent Phenol Vials" were sent offsite for disposal.

- 4. *Some Universal Waste batteries were found in a shed in the "Boneyard" (Photos 33 & 34) at the time of the inspection. As the accumulation start dates for each of these batteries was unreadable, please provide the accumulation start date for each battery found. If any of the batteries has since been shipped offsite, please provide the date(s) and any relevant documentation of such shipment(s).***

Sunoco is unable to quantitatively provide an accumulation start date for the batteries noted in the "boneyard" battery shed. However, it is our standard procedure to have *all* lead acid batteries removed from the shed in a single shipment, and on a frequency that ensures that none can be stored for more than one year. The last shipment prior to the photos being taken was June 16, 2010, and therefore the batteries could not have been stored more than approximately 14 weeks.

All the batteries noted at the time of the USEPA inspection were disposed of on October 13, 2010.

This facility disposes of universal waste, including lead-acid batteries, approximately every four months. Three years of waste manifests for battery disposal events are included as Attachment 4A.

- 5. *Next to this shed several lead acid batteries were also found, all of which appear to have been weathered and one of which appeared to have leaked (Photos 35 & 36). Regarding each of these batteries, please provide:***

- a. Its date of generation***

The referenced batteries were all associated with electric-powered golf carts that were removed from service before the inspection. The batteries were removed and retained when golf carts were taken out of service. Carts removed from service (such as those noted in the inspection) are utilized for spare parts to service other in-service golf carts. Though Sunoco did not test the batteries that were removed from the out of service carts, we have retained such used batteries in the past because we believed they may have remaining useful life and could be used in other carts.

- b. Please state if the battery has been shipped off-site and the date of such shipment. If the battery has not been shipped off-site, state its current location and explain why it has not been shipped off-site.***

To alleviate any uncertainty regarding whether these batteries could be reused, , Sunoco shipped all batteries offsite on October 13, 2010.

- c. If the battery was shipped off-site, provide copies of all bills of lading, manifests (including but not limited to hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied and/or refer to each off-site shipment of this waste.***

This issue was address in question number 4. The requested manifests are included in Attachment 4A.

- d. Please state if the material found leaking from one of the batteries has been cleaned up. If it has, state the date of such clean-up, the methods used, and the final destination of such material. If it has not been cleaned up, please state why.***

One battery that was noted in the “bed” of a cart was leaking. Staining in the bed suggests all spilled liquid remained in the bed. At the time of disposal, no liquid was present. The golf cart has since been sent offsite as scrap metal. No additional cleanup up was required.

- 6. Also in the “Boneyard” the facility appears to maintain a drum decontamination area, in which was found a 55gal drum labeled as containing methanol and appearing to be full (Photo 37), as well as three blue drums labeled as containing “Caustic TBC 85% Water” (shown in Photo 38 after being over-packed). Regarding each of these containers, please provide:***

- a. A detailed description of its source***

This facility utilizes methanol as antifreeze in some of the site’s chilling water systems. Methanol is mixed with the water to lower the freezing point; the mixture is referred to as “brine”.

When the system is recharged or a new batch of brine is introduced, the onsite material handler will stage six to eight full drums of methanol at the chiller. Production will then ad the methanol and water until the desired concentration is achieved. Empty methanol drums are ultimately moved from the chiller to the drum decontamination pad for cleaning and disposal.

A new brine batch was made up in the weeks prior to the facility RCRA inspection. The material handler correctly moved what were believed to be empty metal drums from the chiller to the decontamination pad. Inadvertently, however, the handler moved one of the drums containing methanol to the pad while the material was still in use.

Once discovered, the drum was removed from the pad and returned to inventory.

The two Caustic TBC drums contained a heel of chemical were intended to be steam cleaned, in preparation for disposal. In order to be conservative and expedite the disposal of the drums, Sunoco prepared the three drums of TBC to be sent as waste. Note that the material was initially packaged and labeled as hazardous waste. Upon further review prior to disposal, Sunoco determined that the chemical was not hazardous waste and it was therefore shipped as non-hazardous.

***b. Its date of generation***

The TBC remaining in the drums was unused virgin product. The date of generation is unknown.

***c. State whether a "waste determination" and "LDR determination" has been made for the contents***

The material does not have characteristics of hazardous waste and did not contain specific component chemicals listed as hazardous waste. The chemical does have a basic pH; however the value is greater than pH 2.0. Accordingly, the material was not hazardous waste and no LDR determination is required.

***d. If a "waste determination" and "LDR determination" has been made, state when such a determination(s) was made and the results of such determination(s)***

The material was not hazardous waste and therefore no LDR determination is required.

***e. If the contents have been determined to be "hazardous waste," please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste. If they have been determined not to be hazardous waste, explain the reasons for such determination.***

Not a hazardous waste; not applicable.



- f. State whether any hazardous waste determination made for such waste was based on the generator's knowledge of the process that generated the waste, or upon analytic results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.*

Not a hazardous waste; not applicable.

- g. Please state if the container has been shipped off-site and the date of such shipment(s). If the container has not been shipped off-site, state its current location and explain why it has not been shipped off-site.*

The containers were shipped offsite on October 13, 2010.

- h. If the container was shipped off-site, provide copies of all bills of lading, manifests (including but not limited to hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied and/or refer to each off-site shipment of this waste.*

A copy of the manifest for the disposal of this material is included as Attachment 6A. Note that the three drums sent for disposal had a combined weight of 375 pounds. Considering that the 55-gallon drums were over packed into 85-gallon drums, Sunoco estimates that the weight of the empty drums would be approximately 100 to 110 pounds each – or 300 to 330 pounds, combined. Forty-five to 75 pounds of TBC would equal six to ten gallons of chemicals.

- 7. Regarding daily tank inspections, no logs could be found for the following tanks and dates:*

*Tank VT-130: between 11/15/09 and 11/23/09, and between 12/13/09 and 12/21/09*

*Tank VT-132: between 11/15/09 and 11/23/09*

*Tank VT-245: between 11/15/09 and 11/23/09, and between 12/13/09 and 12/21/09*

*Tank VT-602: between 11/15/09 and 11/23/09, between 12/13/09 and 12/21/09, and between 9/19/10 and 9/26/10*

*Tanks VT-621 & VT-622: between 10/1/90 and 10/18/09, between 11/15/09 and 11/23/09, between 12/13/09 and 12/21/09, and on 1/14/10*

*For each of the above tanks and dates, please state:*

- a. Did the Facility inspect the tank on a daily basis during those times?*

The facility did inspect the tanks on a daily basis during the referenced times. Upon further review of facility inspection records, inspection sheets were located for every specific event noted above. Copies of the inspection records are included as Attachment 7A.

- b. If so, have records been found to verify such inspections? Please submit copies of such documentation if available.***

Copies of the inspection records were located and are included as Attachment 7A.

- c. If not, please state the reason(s) why inspections were not completed for each of the dates listed.***

Not applicable.

- 8. Regarding the Facility's "VT-132 Hazardous Waste Tank Log Sheet," the log for 6/13/08 states that the "Ending Level" of HW in this tank was five feet. It further includes the remarks: "Removed liquid – Clean Harbor will remove heel." On 3/12/09 another log then states that the Ending Level is five feet eleven inches, with the remark "OOS for sludge removal." The next two logs, for 2/16/10 and 5/4/10, give the Ending Level as 2.5 (no units) with the remarks: "Varec broke" and "Tank MT." Finally, the last log included, for 7/26/10, states that the tank is empty. Regarding this tank please provide the following:***

- a. Has tank VT-132 been closed? If so, please state the date of closure and submit all relevant documentation of work completed showing the tank has been closed in accordance with 40 C.F.R. § 265.197.***

Tank VT-132 is not closed. The tank was completely emptied and cleaned on two non-consecutive days of field work. Clean Harbors Environmental Services began cleaning the tank on February 25, 2009 and completed the cleaning on March 30, 2009. The tank is currently empty, locked out, and has not been utilized for the storage of waste since it was cleaned. The vessel continues to be inspected and maintained as required by applicable tank regulations and can be put into service at any time. Copies of the Clean Harbors' field services work sheets for the February 25 and March 30 cleaning events are included as Attachment 8A.

- b. What specifically was done to the tank between the dates of 3/12/09 and 2/16/10 to change its recorded Ending Level from 5'11" to 2.5? Please include the date(s) work was conducted and a specific description of the work. For any material removed from the tank please provide the following:***

On March 30, 2009, the 5' 11" of material remaining in the tank was pumped out and sent offsite as hazardous waste. All wash water associated with the tank cleaning was also collected and sent offsite for disposal.

The 2/16/10 entry on the tank inspection log sheet notes "Varec broke" which is a reference to the Verec © liquid level meter. During the tank cleaning, the meter was damaged and the default reading currently shows 25 feet (rather than "2.5" as noted in USEPA's question). Although the log sheet notes "25" as both the beginning level and the ending level because the faulty Verec © meter so indicated, the sheet also notes "Tank MT" (empty) in the comments section. As noted in our response to 8.a above, the tank remains empty and ready for service.

*i. A detailed description of its source*

The tank was previously utilized to collect phenol residue sludge; this waste material is generated during the manufacturing of phenol.

*ii. Its date of generation*

The tank has been empty since March 30, 2009.

*iii. State whether a "waste determination" and "LDR determination" has been made for the material*

The material that was previously in the tank was composed of distillation bottom tars from the production of phenol and acetone from cumene. By definition, that material was a hazardous waste and an LDR was required.

*iv. If a "waste determination" and "LDR determination" has been made, state when such a determination(s) was made and the results of such determination(s)*

This material has been designated a hazardous waste since the onset of the USEPA RCRA program. The exact date is not available.

*v. If the material has been determined to be "hazardous waste," please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste. If they have been determined not to be hazardous waste, explain the reasons for such determination.*

Hazardous waste stored in tank VT-132 carries the primary hazardous waste code K022.

- vi. *State whether any hazardous waste determination made for such waste was based on the generator's knowledge of the process that generated the waste, or upon analytic results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.*

The hazardous waste determination for Phenol Residue Liquids is based on process / generator knowledge, inasmuch as the waste is from a specific RCRA listed source and carries a "K" code.

- vii. *Please state if the material has been shipped off-site and the date of such shipment(s). If the material has not been shipped off-site, state its current location and explain why it has not been shipped off-site.*

Phenol residue contained in VT-132 was last shipped offsite on March 30, 2009 as part of the tank cleaning process. Normally material from this tank is pumped into VT-621 or VT-622 for feeding the material as a fuel into our onsite boilers. Two individual bulk shipments were sent on the same day. This includes the actual residue from the tank as well as all the wash water from cleaning the tank. Copies of the two respective manifests are included as Attachment 8B.

- viii. *If the material was shipped off-site, provide copies of all bills of lading, manifests (including but not limited to hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied and/or refer to each off-site shipment of this waste.*

Copies of the respective manifests and LDR forms are included as Attachment 8B.

- c. *Was any other material removed from the tank subsequent to 2/16/10? If so, please state the date(s) of such removal and for each removal activity please answer each of the above questions in 8.b.i.-viii. referring to the material removed.*

See above responses. No material has been introduced to VT-132 since 3/30/09; it has remained empty since 3/30/09.

9. *Regarding the Facility's "VT-602 Hazardous Waste Tank Log Sheet," the log for 1/31/09 states that the "Ending Level" of HW in this tank was nine inches. The next log on 6/19/09 states that the Ending Level is zero. Regarding this tank please provide the following:*

- a. Has tank VT-602 been closed? If so, please state the date of closure and submit all relevant documentation of work completed showing the tank has been closed in accordance with 40 C.F.R. § 265.197.*

VT-602 is actively in use.

- b. What specifically was done to the tank between the dates of 1/31/09 and 6/19/09 to change its recorded Ending Level from nine inches to zero? Please include the date(s) work was conducted and a specific description of the work. For any material removed from the tank please provide the following:*

There was no specific work done to this tank between 1/31/09 and 6/19/09. Tank VT-602 is equipped with a liquid-level transmitter that automatically records the tank level to the site's data management system. A review of the DMS data shows that the tank was pumped down on January 31, 2009 from 1.9' to 0.9'. On April 1, 2009, the tank was pumped from 1.2' to 0.0' and on June 19, 2001, it was pumped from 1.9' to 0.0'. The April 1, 2009 transfer was not manually recorded on the VT-602 log sheet.

We do not know why the tank was not pumped to 0.0' during the January 31, 2009 transfer. However, it is believed that the tank may have contained oil and a small amount of separate-phase water. Under such circumstances, the operator would likely pump out the oil and leave the "heel", which contains primarily water.

- i. A detailed description of its source*

Under normal operating conditions, groundwater and light non-aqueous phase liquid (LNAPL) are recovered from the site's active pumping wells and directed to tank VT-601. VT-601 is a decanting tank; water off the bottom of the tank is directed to the air stripper tower. The impacted water is not classified as a hazardous waste. The recovered oil rises to the top of VT-601 and gravity drains to VT-602. The recovered oil is classified as hazardous waste. When VT-602 is full – or every 90 days (which ever comes first), the recovered oil is pumped to VT-621 / VT-622. These two tanks contain waste phenol residue used as a fuel for boilers BL-701 and BL-702. The recovered LNAPL mixes with the phenol residue and is ultimately destroyed in the onsite boilers. These activities are specifically permitted in the site's Part B permit.

- ii. Its date of generation*

The rate at which waste is generated and introduced to this tank is highly variable. Generation is relative to several factors including rain fall, water table elevation, and operations of the pumping wells. Accordingly, a quantitative date of generation cannot

be determined with specificity. To ensure compliance with storage time limits, the tank is emptied on approximately a 60 to 80-day basis.

***iii. State whether a “waste determination” and “LDR determination” has been made for the material***

Under normal operating conditions, waste is not removed from this tank for off-site disposal. Recovered oil is burned in the facility’s hazardous waste-fired boilers. A relatively insignificant volume of water that may accumulate in the tank is sent to VT601 and eventually treated in the air stripper column. The facility’s Part B permit specifically allows for the destruction of recovered oil in waste-fire boilers.

***iv. If a “waste determination” and “LDR determination” has been made, state when such a determination(s) was made and the results of such determination(s)***

Waste from this tank is not sent offsite; there is no specific LDR determination.

***iv. If the material has been determined to be “hazardous waste,” please state the specific EPA Hazardous Waste Code(s) associated with each such hazardous waste. If they have been determined not to be hazardous waste, explain the reasons for such determination.***

The material in this tank is an indefinable combination of oils and LNAPL recovered from the onsite groundwater wells. The LNAPL is coded as D001 (flammability).

***vi. State whether any hazardous waste determination made for such waste was based on the generator’s knowledge of the process that generated the waste, or upon analytic results. If a determination was made on the basis of process knowledge, describe in detail the scientific rationale for such a determination. If the determination was based on analytical results, describe the sampling procedures and provide copies of any and all such results.***

The determination that the material will flash was likely based on historical quantitative analysis. This analysis was first completed over 20 years ago; exact lab data is not readily available

***vii. Please state if the material has been shipped off-site and the date of such shipment(s). If the material has not been shipped off-site, state its current location and explain why it has not been shipped off-site.***

Under normal operating conditions, this material is not shipped off site for disposal. The material is ultimately destroyed in the onsite boilers BL-701 and BL-702.

- viii. If the material was shipped off-site, provide copies of all bills of lading, manifests (including but not limited to hazardous waste manifests), shipping invoices, and LDR notices and certifications that accompanied and/or refer to each off-site shipment of this waste.*

Not applicable.

- 10. At the time of EPA's inspection, did the Facility maintain a written job description for each of the positions related to hazardous waste management, which includes the requisite skill, education, or other qualifications, and duties of Facility personnel assigned to each position? If so, please provide a copy of the job descriptions being maintained at the time of the inspection. If a list of job descriptions was not maintained at the time of the inspection, provide a copy of any such list created since the inspection, identifying the date on which such list was compiled.*

Sunoco is currently researching the request for additional information. In June 2, 2011 phone and email communications between Paul Persing of this facility, and Martin Matlin of USEPA, Mr. Matlin agreed to an extension to provide select information. Sunoco will provide a complete response to this issue by July 15, 2011.

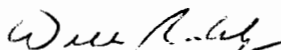
Martin Matlin  
June 24, 2011  
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I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: William Rodebaugh  
Name: WILLIAM RODEBAUGH  
Title: OPERATIONS MANAGER

If you have any questions concerning this matter, please contact Paul Persing at (215) 807-8453.

Sincerely,



William Rodebaugh  
Operations Manager

Attachments



**Attachment 1A**  
**Work Order for Recoating of Waste Pad**

# TabWare 5.1.00

File Edit Modules Advanced Window Help



## Work Order Status Change & Approval

Work Order RT025094

SERVICE PAINT RESEAL AND REPAINT ZONES

Close

### Status

- ☐ Awaiting Material
- ☐ Material Reserved
- ☐ Ready to Schedule
- ☐ Scheduled
- ☐ Completed in Field
- ☐ Blanket
- ☐ Pending Closeout
- ☒ Completed
- ☐ PM Closed-Not Wk
- ☐ Closed to Charge
- ☐ Cancelled
- ☐ Rejected

Equipment DRUMPARK

DRUM PARK

Priority 3

Matl Due Date

Planner makowskibd

Supervisor

Area RCVSYS

Department 46163540

Total Planned \$14,080.00

Total Actual \$14,000.00

Next Reviewer

Approved By Makowski, Brian

Actions...

### Activity Log

(Double-click to edit comments)

Activity	On Date	UserID	New Status
<input type="checkbox"/> StatusChng	9/8/2010	persingpm	Entered
<input type="checkbox"/> StatusChng	10/11/2010	odeatj	Approve for Planning
<input type="checkbox"/> StatusChng	10/19/2010	makowskibd	Planning Complete
<input type="checkbox"/> Approve	10/19/2010	makowskibd	

Cancel Approval

Printing...

**Attachment 1B**  
**Purchase Order for Recoating of Waste Pad and**  
**Final Vendor Invoice**

## Requisition RT025094

**Delivery:** 1    **Area:** STORES    **Date:**    **Time:**    **Deliver To:** Makowski, Brian D

Line	Item	Item Type	Requested Quantity	Unit of Measure	Unit Cost	Extended Cost	Outside Purchase	Optional
1	RT025094-01	Service	1	NE	14,000.00	14,000.00	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Description:** SERVICE PAINT-RESURFACE SEAL DRUM PARK  
CONTRACTOR TO PROVIDE THE FOLLOWING:

- 1.LABOR
- 2.SUPERVISION
- 3.EQUIPMENT
- 4.MATERIAL
- 5.TOOLS

TO:

SERVICE PAINT-BLAST CLEAN, RESURFACE AND SEAL DRUM PARK

**Date Required from Supplier:**

**Purchase Order:** FKS0006668-0000

**Line:** 1

**Recommended**

**Supplier:** SERPAI00

SERVICE PAINTING INC

**Manufacturer:**

**Part Number:**

**No Substitutes:** ☐

**Requester:** makowskibd

**Approved By:** makowskibd

**Buyer:**

Charges	Work Order	Account	Area	Department	Amount
	RT025094	5102321	RCVSYS	46163540	14,000.00

**Requisition:** RT025094

**Total Extended Cost:** 14,000.00

- NICK GARAVELIS -  
- 610-226-5011 -

# **SERVICE PAINTING, INC.**

P.O. Box 433 • Marcus Hook, PA 19061 • Tel: 610.497.4700 • Fax: 610.497.0723

## **INVOICE**

**DATE:** 11/11/10

**INVOICE NO.:** 11618-1S-01

**TERMS:** NET 30 DAYS

**Contract #** FKS0006668-000(000

**COMPANY:** Sunoco, Inc. (R&M)  
Frankford Plant  
Margaret & Bermuda Sts  
Philadelphia, PA 19137

**FIELD ENGINEER:** Brian Makowski

**RE:** Furnished Labor, Materials, Equipment, Etc., to Complete Work On:  
Drum Lay Down Area:

**Contract Amount:** \$ 14,000.00

**Completed to date 100%** \$ 14,000.00

**Amount Due This Invoice:** \$ 14,000.00

*Approved*  
*BD Makowski*  
*12-14-2010*

*Payment Beyond Terms Shown Are Subject to L.P.S.C. of 1 1/2% Per Month*

**Attachment 1C**  
**Cut Sheet for Sherman Williams COR-COTE ®**  
**VEN GF (Waste Storage Pad Surface Coating)**



# Protective & Marine Coatings

## COR-COTE® VEN GF GRAPHITE FILLED VINYL ESTER

PART A  
PART B  
PART B

B88A30  
B88R99  
B88V99  
970C949

RED CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
CLEAR CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
CHARCOAL GRAY  
WAX SOLUTION

### PRODUCT INFORMATION

TRM 49

#### RECOMMENDED SYSTEMS

		Dry Film Thickness / ct.	
		Mils	(Microns)
<b>Steel (coating, lining):</b>			
<b>Medium Film Lining</b>			
1 ct.	Corobond Vinyl Ester Primer	2.0-3.0	(50-75)
1 ct.	Poly-Glass Putty as required for filling pits and transitioning sharp edges, weld seams, etc.		
1 ct.	Cor-Cote VEN GF	15.0-20.0	(375-500)
1 ct.	Cor-Cote VEN GF with Wax Solution	15.0-20.0	(375-500)
<b>Concrete (lining, containment, flooring):</b>			
<b>Medium Film Lining</b>			
1 ct.	Corobond Vinyl Ester Primer	3.5-4.5	(88-112)
1 ct.	Poly-Glass Putty as required for filling voids and bugholes to provide a continuous substrate		
1 ct.	Cor-Cote VEN GF	15.0-20.0	(375-500)
1 ct.	Cor-Cote VEN GF with Wax Solution	15.0-20.0	(375-500)
<b>Concrete (conductive lining, containment, flooring):</b>			
<b>Medium Film Lining</b>			
1 ct.	Corobond Conductive Vinyl Ester Primer	3.5-4.5	(88-112)
1 ct.	Poly-Glass Putty as required for filling voids and bugholes to provide a continuous substrate		
1 ct.	Cor-Cote VEN GF	15.0-20.0	(375-500)
1 ct.	Cor-Cote VEN GF with Wax Solution	15.0-20.0	(375-500)

The systems listed above are representative of the product's use, other systems may be appropriate.

#### SURFACE PREPARATION

Surface must be clean, dry, and in sound condition. Remove all oil, dust, grease, dirt, loose rust, and other foreign material to ensure adequate adhesion.

Refer to product Application Bulletin for detailed surface preparation information.

Minimum recommended surface preparation:

<b>Iron &amp; Steel:</b>	
Atmospheric	SSPC-SP6/NACE 3, 2 mil (50 micron) profile
Immersion:	SSPC-SP10/NACE 2, 2-3 mil (50-75 micron) profile
<b>Concrete &amp; Masonry:</b>	
Atmospheric:	SSPC-SP13/NACE 6, or ICRI No. 310.2, CSP 3-5
Immersion:	SSPC-SP13/NACE 6-4, 3.1 or 4.3 2or ICRI No. 310.2, CSP 3-5

#### Surface Preparation Standards

Condition of Surface	ISO 8501-1 BS7079:A1	Swedish Std. SIS055900	SSPC	NACE
White Metal	Sa 3	Sa 3	SP 5	1
Near White Metal	Sa 2.5	Sa 2.5	SP 10	2
Commercial Blast	Sa 2	Sa 2	SP 6	3
Brush Off Blast	Sa 1	Sa 1	SP 7	4
Hand Tool Cleaning	PuSt 2	C St 2	SP 2	-
Pitted & PuSted	PuSt 2	D St 2	SP 2	-
Power Tool Cleaning	PuSt 3	C St 3	SP 3	-
Pitted & PuSted	D St 3	D St 3	SP 3	-

#### TINTING

Do not tint.

#### APPLICATION CONDITIONS

Temperature:	50°F (10°C) minimum, 90°F (32°C) maximum (air, surface, material) At least 5°F (2.8°C) above dew point
Relative humidity:	85% maximum

Refer to product Application Bulletin for detailed application information.

#### ORDERING INFORMATION

<b>Packaging:</b>	
Part A:	1 gallon (3.78L) and 5 gallons (18.9L)
Part B:	1 gallon (3.78L)

#### SAFETY PRECAUTIONS

Refer to the MSDS sheet before use.

Published technical data and instructions are subject to change without notice. Contact your Sherwin-Williams representative for additional technical data and instructions.

#### WARRANTY

The Sherwin-Williams Company warrants our products to be free of manufacturing defects in accord with applicable Sherwin-Williams quality control procedures. Liability for products proven defective, if any, is limited to replacement of the defective product or the refund of the purchase price paid for the defective product as determined by Sherwin-Williams. NO OTHER WARRANTY OR GUARANTEE OF ANY KIND IS MADE BY SHERWIN-WILLIAMS, EXPRESSED OR IMPLIED. STATUTORY, BY OPERATION OF LAW OR OTHERWISE, INCLUDING MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

#### DISCLAIMER

The information and recommendations set forth in this Product Data Sheet are based upon tests conducted by or on behalf of The Sherwin-Williams Company. Such information and recommendations set forth herein are subject to change and pertain to the product offered at the time of publication. Consult your Sherwin-Williams representative to obtain the most recent Product Data Information and Application Bulletin.



# Protective & Marine Coatings

## COR-COTE® VEN GF GRAPHITE FILLED VINYL ESTER

PART A  
PART B  
PART B

B88A30  
B88R99  
B88V99  
970C949

RED CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
CLEAR CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
CHARCOAL GRAY  
WAX SOLUTION

Revised 11/10

### APPLICATION BULLETIN

TRM 49

#### SURFACE PREPARATIONS

Surface must be clean, dry, and in sound condition. Remove all oil, dust, grease, dirt, loose rust, and other foreign material to ensure adequate adhesion.

##### Iron & Steel (immersion service)

Remove all oil and grease from surface by Solvent Cleaning per SSPC-SP1. Minimum surface preparation is Near White Metal Blast Cleaning per SSPC-SP10/NACE 2. Blast clean all surfaces using a sharp, angular abrasive for optimum surface profile (2 mils / 50 microns). Remove all weld spatter and round all sharp edges. Prime any bare steel the same day as it is cleaned or before flash rusting occurs.

##### Iron & Steel (atmospheric service)

Remove all oil and grease from surface by Solvent Cleaning per SSPC-SP1. Minimum surface preparation is Commercial Blast Cleaning per SSPC-SP6/NACE 3. For better performance, use Near White Metal Blast Cleaning per SSPC-SP10/NACE 2. Blast clean all surfaces using a sharp, angular abrasive for optimum surface profile (2 mils / 50 microns). Prime any bare steel the same day as it is cleaned or before flash rusting occurs.

##### Concrete and Masonry

For surface preparation, refer to SSPC-SP13/NACE 6, or ICRI No. 310.2, CSP 3-5. Surfaces should be thoroughly clean and dry. Concrete and mortar must be cured at least 28 days @ 75°F (24°C). Remove all loose mortar and foreign material. Surface must be free of laitance, concrete dust, dirt, form release agents, moisture curing membranes, loose cement and hardeners. Fill bug holes, air pockets and other voids with Steel-Seam FT910. Primer required.

If surface deterioration presents an unacceptably rough surface, prime with Corobond Vinyl Ester Primer. Patch and resurface with Poly-Glass Putty.

Fill all cracks, voids and bugholes with Poly-Glass Putty (over Corobond Vinyl Ester Primer).

##### Follow the standard methods listed below when applicable:

ASTM D4258 Standard Practice for Cleaning Concrete  
ASTM D4259 Standard Practice for Abrading Concrete  
ASTM D4260 Standard Practice for Etching Concrete  
ASTM F1869 Standard Test Method for Measuring Moisture Vapor Emission Rate of Concrete  
SSPC-SP 13/NACE 6 Surface Preparation of Concrete  
ICRI No. 310.2 Concrete Surface Preparation

##### Concrete, Immersion Service:

For surface preparation, refer to SSPC-SP13/NACE 6, Section 4.3.1 or 1.3.2 or ICRI No. 310.2, CSP 3-5.

#### Surface Preparation Standards

Condition of Surface	ISO 8501-1 BS7079:A1	Swedish Std. SIS055900	SSPC	NACE
White Metal	Sa 3	Sa 3	SP 5	1
Near White Metal	Sa 2.5	Sa 2.5	SP 10	2
Commercial Blast	Sa 2	Sa 2	SP 6	3
Brush-Off Blast	Sa 1	Sa 1	SP 7	4
Hand Tool Cleaning	CSi 2	CSi 2	SP 2	-
Pitted & Rusted	CSi 2	CSi 2	SP 2	-
Pitted	CSi 3	CSi 3	SP 3	-
Power Tool Cleaning	CSi 3	CSi 3	SP 3	-
Pitted & Rusted	CSi 3	CSi 3	SP 3	-

#### APPLICATION CONDITIONS

Temperature: 50°F (10°C) minimum, 90°F (32°C) maximum  
(air, surface, material)  
At least 5°F (2.8°C) above dew point

Relative humidity: 85% maximum

#### APPLICATION EQUIPMENT

The following is a guide. Changes in pressures and tip sizes may be needed for proper spray characteristics. Always purge spray equipment before use with listed reducer. Any reduction must be compliant with existing VOC regulations and compatible with the existing environmental and application conditions.

Reduction ..... Not recommended

Cleanup ..... MEK, R6K10

##### Catalyst Injection Spray:

Pump..... Catalyst injection (external mixing)  
Pump Ratio..... 30:1 with catalyst pump  
Gun..... Polycraft or equivalent  
Fluid Hose..... 3/8" - 1/2" I.D.  
Tip Orifice..... .035" - .045"  
Fan Width..... 40 degrees  
Fluid Pressure..... 2000 - 3000 psi  
Filter Screen..... Filters must be removed

##### Brush:

Brush..... Natural bristle for applications in small areas

##### Roller:

Cover..... 3/8" nap for coatings

##### Squeegee:

Squeegee..... For horizontal applications followed by back roll with medium nap roller

If specific application equipment is not listed above, equivalent equipment may be substituted





# Protective & Marine Coatings

PART A  
PART B  
PART B

## COR-COTE® VEN GF GRAPHITE FILLED VINYL ESTER

B88A30  
B88R99  
B88V99  
970C949

CHARCOAL GRAY  
RED CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
CLEAR CHP - CUMENE HYDROGEN PEROXIDE (CATALYST)  
WAX SOLUTION

### APPLICATION BULLETIN

TRM.49

#### APPLICATION PROCEDURES

Surface preparation must be completed as indicated.

For detailed installation instructions, refer to the Installation Procedures for the respective system type in the ControlTech Technical Resource Manual.

**Mixing Instructions:** Premix Part A component separately, using a low-speed drill and Jiffy Blade model ES mixer. Make certain no pigment or graphite flake remains on the bottom or sides of the can. Use CHP catalyst at the rate of 2.0 - 4.0 fluid oz. per gallon (3.78L) of Part A, depending on environmental conditions. Mix with low-speed drill and Jiffy Blade model ES mixer for three minutes and until uniform.

#### For topcoat only:

Add 970-C-949 Wax Solution at the rate of 3 - 4 oz per gallon (3.78L) of Part A to obtain a completely tack free surface. Add wax solution before adding catalyst. If wax solution is cloudy, it will clear with gentle warming. DO NOT USE FLAME TO HEAT THE WAX SOLUTION.

Apply paint at the recommended film thickness and spreading rate as indicated below.

#### Recommended Spreading Rate per coat:

	Minimum	Maximum
Wet mils (microns)	20.0 (500)	25.0 (625)
Dry mils (microns)	15.0 (375)	20.0 (500)
~Coverage sq ft/gal (m <sup>2</sup> /L)	64 (1.6)	80 (2.0)
Theoretical coverage sq ft/gal (m <sup>2</sup> /L) @ 1 mil / 25 microns dft	1600 (39.2)	

#### Drying Schedule @ 20.0 mils wet (500 microns):

	@ 60° F/16° C	@ 73° F/23° C 50% RH	@ 90° F/32° C
To touch:	16 hours	6 hours	3 hours
To recoat:			
minimum:	12 hours	3 hours	2 hours
maximum*:	4 days	72 hours	48 hours
To cure:	48 hours	24 hours	16 hours

\*If uncertain, test by rubbing surface with styrene. If surface does not become tacky, surface must be lightly blasted or sanded prior to recoating.

If maximum recoat time is exceeded, abrade surface before recoating.

Drying time is temperature, humidity, and film thickness dependent.

Pot Life:	30-60 minutes
Sweat-in-time:	Not required

Application of coating above maximum or below minimum recommended spreading rate may adversely affect coating performance.

#### CLEAN UP INSTRUCTIONS

Clean spills and spatters immediately with MEK, R6K10. Clean tools immediately after use with MEK, R6K10. Follow manufacturer's safety recommendations when using any solvent.

#### DISCLAIMER

The information and recommendations set forth in this Product Data Sheet are based upon tests conducted by or on behalf of The Sherwin-Williams Company. Such information and recommendations set forth herein are subject to change and pertain to the product offered at the time of publication. Consult your Sherwin-Williams representative to obtain the most recent Product Data Information and Application Bulletin.

#### PERFORMANCE TIPS

For concrete, always perform Calcium Chloride test as per ASTM F1869. Do not proceed with MVE >3 lbs.

For steel, stripe coat all chime, welds, bolted connections, and sharp angles to prevent early failure in these areas.

Pot life of this material is short. Working time can be extended by mixing small batches and by getting material out of mixing containers and on to the working surface in desired film thickness as quickly as possible.

Spreading rates are calculated on volume solids and do not include an application loss factor due to surface profile, roughness or porosity of the surface, skill and technique of the applicator, method of application, various surface irregularities, material lost during mixing, spillage, overthinning, climatic conditions, and excessive film build.

For immersion applications: Holiday test prior to application of Cor-Cote VEN GF in accordance with ASTM D5162 for steel or ASTM D4787 for concrete. Cor-Cote VEN GF is conductive and can not be spark tested. Set voltage in accordance with the manufacturer's recommendation. Repair holidays found prior to application of final coat.

When using spray application, use a 50% overlap with each pass of the gun to avoid holidays, bare areas, and pinholes. If necessary, cross spray at a right angle. In order to avoid blockage of spray equipment, clean equipment before use or before periods of extended downtime with MEK, R6K10.

Store in a temperature controlled environment, 50°F (10°C) to 80°F (26°C), and out of direct sunlight. Keep resins, catalysts, and solvents separated from each other and away from sources of ignition.

Do not apply material beyond recommended pot life.

Do not mix previously catalyzed material with new.

Consult your Sherwin-Williams representative for specific application and performance recommendations.

Refer to Product Information sheet for additional performance characteristics and properties.

#### SAFETY PRECAUTIONS

Refer to the MSDS sheet before use.

Published technical data and instructions are subject to change without notice. Contact your Sherwin-Williams representative for additional technical data and instructions.

#### WARRANTY

The Sherwin-Williams Company warrants our products to be free of manufacturing defects in accord with applicable Sherwin-Williams quality control procedures. Liability for products proven defective, if any, is limited to replacement of the defective product or the refund of the purchase price paid for the defective product as determined by Sherwin-Williams. NO OTHER WARRANTY OR GUARANTEE OF ANY KIND IS MADE BY SHERWIN-WILLIAMS, EXPRESSED OR IMPLIED, STATUTORY, BY OPERATION OF LAW OR OTHERWISE, INCLUDING MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.

# MATERIAL SAFETY DATA SHEET

B88A30  
06 00

DATE OF PREPARATION  
May 1, 2011

## SECTION 1 — PRODUCT AND COMPANY IDENTIFICATION

### PRODUCT NUMBER

B88A30

### PRODUCT NAME

COR-COTE® VEN GF - Graphite Filled Vinyl Ester, Charcoal Gray

### MANUFACTURER'S NAME

THE SHERWIN-WILLIAMS COMPANY

101 Prospect Avenue N.W.

Cleveland, OH 44115

### Telephone Numbers and Websites

Product Information	www.sherwin-williams.com
Regulatory Information	(216) 566-2902 www.paintdocs.com
Medical Emergency	(216) 566-2917
Transportation Emergency*	(800) 424-9300
*for Chemical Emergency ONLY (spill, leak, fire, exposure, or accident)	

## SECTION 2 — COMPOSITION/INFORMATION ON INGREDIENTS

% by Weight	CAS Number	Ingredient	Units	Vapor Pressure
33	100-42-5	Styrene		(Styrene polymerizes when catalyzed) 4.3 mm
		ACGIH TLV	20 PPM	
		ACGIH TLV	40 PPM STEL	
		OSHA PEL	100 PPM	
		OSHA PEL	215 PPM CEILING	
3	79-41-4	Methacrylic Acid		
		ACGIH TLV	Not Available	1 mm
		OSHA PEL	Not Available	
2	7631-86-9	Amorphous Silica		
		ACGIH TLV	10 mg/m3 as Dust	
		OSHA PEL	6 mg/m3 as Dust	
4	13463-67-7	Titanium Dioxide		
		ACGIH TLV	10 mg/m3 as Dust	
		OSHA PEL	10 mg/m3 Total Dust	
		OSHA PEL	5 mg/m3 Respirable Fraction	
21	7782-42-5	Graphite		
		ACGIH TLV	2 MG/M3	
		OSHA PEL	2.5 MG/M3	

## SECTION 3 — HAZARDS IDENTIFICATION

### ROUTES OF EXPOSURE

INHALATION of vapor or spray mist.

EYE or SKIN contact with the product, vapor or spray mist.

### EFFECTS OF OVEREXPOSURE

EYES: Irritation

SKIN: Prolonged or repeated exposure may cause irritation.

INHALATION: Irritation of the upper respiratory system.

May cause nervous system depression. Extreme overexposure may result in unconsciousness and possibly death.

### SIGNS AND SYMPTOMS OF OVEREXPOSURE

Headache, dizziness, nausea, and loss of coordination are indications of excessive exposure to vapors or spray mists.

Redness and itching or burning sensation may indicate eye or excessive skin exposure.

### MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE

None generally recognized.

### HMIS Codes

Health	3*
Flammability	2
Reactivity	2

B88A30

**CANCER INFORMATION**

For complete discussion of toxicology data refer to Section 11.

**SECTION 4 — FIRST AID MEASURES**

**EYES:** Flush eyes with large amounts of water for 15 minutes. Get medical attention.  
**SKIN:** Wash affected area thoroughly with soap and water.  
 Remove contaminated clothing and laundry before re-use.  
**INHALATION:** If affected, remove from exposure. Restore breathing. Keep warm and quiet.  
**INGESTION:** Do not induce vomiting. Get medical attention immediately.

**SECTION 5 — FIRE FIGHTING MEASURES**

<b>FLASH POINT</b> 130 °F PMCC	<b>LEL</b> 1.1	<b>UEL</b> 6.1	<b>FLAMMABILITY CLASSIFICATION</b> Combustible, Flash above 99 and below 200 °F
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**EXTINGUISHING MEDIA**

Carbon Dioxide, Dry Chemical, Foam

**UNUSUAL FIRE AND EXPLOSION HAZARDS**

Closed containers may explode when exposed to extreme heat.  
 Application to hot surfaces requires special precautions.  
 During emergency conditions overexposure to decomposition products may cause a health hazard. Symptoms may not be immediately apparent. Obtain medical attention.

**SPECIAL FIRE FIGHTING PROCEDURES**

Full protective equipment including self-contained breathing apparatus should be used.  
 Water spray may be ineffective. If water is used, fog nozzles are preferable. Water may be used to cool closed containers to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat.

**SECTION 6 — ACCIDENTAL RELEASE MEASURES****STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED**

Remove all sources of ignition. Ventilate the area.  
 Remove with inert absorbent.

**SECTION 7 — HANDLING AND STORAGE****STORAGE CATEGORY**

DOL Storage Class II

**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE**

Contents are COMBUSTIBLE. Keep away from heat and open flame.  
 Consult NFPA Code. Use approved Bonding and Grounding procedures.  
 Keep container closed when not in use. Transfer only to approved containers with complete and appropriate labeling. Do not take internally.  
 Keep out of the reach of children.

**SECTION 8 — EXPOSURE CONTROLS/PERSONAL PROTECTION****PRECAUTIONS TO BE TAKEN IN USE**

Use only with adequate ventilation.  
 Avoid contact with skin and eyes. Avoid breathing vapor and spray mist.  
 Wash hands after using.  
 This coating may contain materials classified as nuisance particulates (listed "as Dust" in Section 2) which may be present at hazardous levels only during sanding or abrading of the dried film. If no specific dusts are listed in Section 2, the applicable limits for nuisance dusts are:  
 ACGIH TLV 10 mg/m<sup>3</sup> (total dust), 3 mg/m<sup>3</sup> (respirable fraction), OSHA PEL 15 mg/m<sup>3</sup> (total dust), 5 mg/m<sup>3</sup> (respirable fraction).

**VENTILATION**

Local exhaust preferable. General exhaust acceptable if the exposure to materials in Section 2 is maintained below applicable exposure limits.  
 Refer to OSHA Standards 1910.94, 1910.107, 1910.108.

**RESPIRATORY PROTECTION**

If personal exposure cannot be controlled below applicable limits by ventilation, wear a properly fitted organic vapor/particulate respirator approved by NIOSH/MSHA for protection against materials in Section 2.  
 When sanding or abrading the dried film, wear a dust/mist respirator approved by NIOSH/MSHA for dust which may be generated from this product, underlying paint, or the abrasive.

**PROTECTIVE GLOVES**

Wear gloves which are recommended by glove supplier for protection against materials in Section 2.

**EYE PROTECTION**

Wear safety spectacles with unperforated sideshields.

**OTHER PRECAUTIONS**

Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal.



## SECTION 14 — TRANSPORT INFORMATION

Multi-modal shipping descriptions are provided for informational purposes and do not consider container sizes. The presence of a shipping description for a particular mode of transport (ocean, air, etc.), does not indicate that the product is packaged suitably for that mode of transport. All packaging must be reviewed for suitability prior to shipment, and compliance with the applicable regulations is the sole responsibility of the person offering the product for transport.

### US Ground (DOT)

May be Classed as a Combustible Liquid for U.S. Ground.

UN1263, PAINT, 3, PG III, (ERG#128)

### DOT (Dept of Transportation) Hazardous Substances & Reportable Quantities

Styrene monomer 1000 lb RQ

### Bulk Containers may be Shipped as (check reportable quantities):

UN1263, PAINT, COMBUSTIBLE LIQUID, PG III, (ERG#128)

### Canada (TDG)

May be Classed as a Combustible Liquid for Canadian Ground.

UN1263, PAINT, CLASS 3, PG III, (ERG#128)

### IMO

5 Liters (1.3 Gallons) and Less may be Shipped as Limited Quantity.

UN1263, PAINT, CLASS 3, PG III, (54 C d c), EmS F-E, S-E, ADR (D/E)

### IATA/ICAO

UN1263, PAINT, 3, PG III

## SECTION 15 — REGULATORY INFORMATION

### SARA 313 (40 CFR 372.65C) SUPPLIER NOTIFICATION

CAS No.	CHEMICAL/COMPOUND	% by WT	% Element
100-42-5	Styrene	33	

### CALIFORNIA PROPOSITION 65

WARNING: This product contains chemicals known to the State of California to cause cancer.

### TSCA CERTIFICATION

All chemicals in this product are listed, or are exempt from listing, on the TSCA Inventory.

## SECTION 16 — OTHER INFORMATION

This product has been classified in accordance with the hazard criteria of the Canadian Controlled Products Regulations (CPR) and the MSDS contains all of the information required by the CPR.

The above information pertains to this product as currently formulated, and is based on the information available at this time. Addition of reducers or other additives to this product may substantially alter the composition and hazards of the product. Since conditions of use are outside our control, we make no warranties, express or implied, and assume no liability in connection with any use of this information.

**Attachment 3A**  
**Photo of Metal Safety Can Used for Waste**  
**Collection**



**JUSTRITE®**

**Six Gallon**

**Oily Waste Can**

**23 litros**

**Contenedor De  
Desperdicios Aceitosos**



**FM  
APPROVED**  
For temporary containment of oil or  
solvent soaked rags  
Para la contención temporal de aceite o trapos  
Impregnado con solvente

**With or without convenient foot pedal**  
Con o sin palanca conveniente para el pie

**Elevated bottom for improved heat dispersion**  
Fondo elevado para mejorar la dispersión del calor

**Self-closing cover**  
Tapa que cierra sola

**Chemical/corrosion resistant  
powdercoat finish**  
Acabado de polvo resistente a los  
químicos/corrosión



**09110**

**09100**

**Manufacturing Co., L.L.C., Mattoon, IL 61938**

**Part Number  
Número de Parte  
09100**

**NOTICE**  
ALL SPENT  
PHENOL GC VIALS  
IN THIS CONTAINER  
ARE THE PROPERTY OF GENERATION

**Attachment 3B**  
**Photo Showing Capacity of Five-Gallon Plastic**  
**Cans**





**Attachment 3C**  
**Profiles for “Spent GC Vials” and “Spent Phenol**  
**GC Vials”**



# WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. L339743

## A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #  
GENERATOR CODE (Assigned by Clean Harbors)  
ADDRESS

PAD002312791  
SU0285

GENERATOR NAME:  
CITY

Sunoco Inc  
Philadelphia PA ZIP/POSTAL CODE 19137

CUSTOMER CODE (Assigned by Clean Harbors)  
ADDRESS

SU0285

CUSTOMER NAME:  
CITY

PHONE: (215) 807-8442  
Sunoco Inc  
Philadelphia PA ZIP/POSTAL CODE 19137

## B. WASTE DESCRIPTION

WASTE DESCRIPTION: Spent GC vials

PROCESS GENERATING WASTE: Lab analysis

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? No

## C. PHYSICAL PROPERTIES (at 25C or 77F)

<b>PHYSICAL STATE</b> SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID 0.00 - 25.00 % SETTLED SOLID 0.00 - 75.00 SLUDGE GAS/AEROSOL	<b>NUMBER OF PHASES/LAYERS</b> 1 2 3 TOP 25.00 % BY VOLUME (Approx.) MIDDLE 0.00 BOTTOM 75.00	<b>VISCOSITY (If liquid present)</b> 1 - 100 (e.g. Water) 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000	<b>COLOR</b> Varies
	<b>ODOR</b> NONE MILD STRONG Describe:	<b>BOILING POINT °F (°C)</b> <= 95 (<=35) 95 - 100 (35-38) 101 - 129 (38-54) >= 130 (>54)	<b>MELTING POINT °F (°C)</b> < 140 (<60) 140-200 (60-93) > 200 (>93)
			<b>TOTAL ORGANIC CARBON</b> <= 1% 1-9% >= 10%
<b>FLASH POINT °F (°C)</b> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) > 200 (>93)	<b>pH</b> <= 2 2.1 - 6.9 7 (Neutral) 7.1 - 12.4 >= 12.5	<b>SPECIFIC GRAVITY</b> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)	<b>ASH</b> < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0
			<b>BTU/LB (MJ/kg)</b> < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) > 10,000 (>23.2) Actual:

## D. COMPOSITION

(List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	MAX	UOM
ACETONE	0.0000000	15.0000000	%
ALPHA-METHYL STYRENE	0.0000000	15.0000000	%
CUMENE	0.0000000	15.0000000	%
GLASS VIALS	50.0000000	75.0000000	%
METAL CAPS	0.0000000	10.0000000	%
PLASTIC	0.0000000	5.0000000	%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. G22

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. W409



## E. CONSTITUENTS

Are these values based on testing or knowledge?



Knowledge

Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Lab analysis

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>

## VOLATILE COMPOUNDS

D018	BENZENE	0.5
D019	CARBON TETRACHLORIDE	0.5
D021	CHLOROBENZENE	100.0
D022	CHLOROFORM	6.0
D028	1,2-DICHLOROETHANE	0.5
D029	1,1-DICHLOROETHYLENE	0.7
D035	METHYL ETHYL KETONE	200.0
D039	TETRACHLOROETHYLENE	0.7
D040	TRICHLOROETHYLENE	0.5
D043	VINYL CHLORIDE	0.2

## SEMI-VOLATILE COMPOUNDS

D023	o-CRESOL	200.0
D024	m-CRESOL	200.0
D025	p-CRESOL	200.0
D026	CRESOL (TOTAL)	200.0
D027	1,4-DICHLOROBENZENE	7.5
D030	2,4-DINITROTOLUENE	0.13
D032	HEXACHLOROBENZENE	0.13
D033	HEXACHLOROBUTADIENE	0.5
D034	HEXACHLOROETHANE	3.0
D036	NITROBENZENE	2.0
D037	PENTACHLOROPHENOL	100.0
D038	PYRIDINE	5.0
D041	2,4,5-TRICHLOROPHENOL	400.0
D042	2,4,6-TRICHLOROPHENOL	2.0

## PESTICIDES AND HERBICIDES

D012	ENDRIN	0.02
D013	LINDANE	0.4
D014	METHOXYCHLOR	10.0
D015	TOXAPHENE	0.5
D016	2,4-D	10.0
D017	2,4,5-TP (SILVEX)	1.0
D020	CHLORDANE	0.03
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008

## OTHER CONSTITUENTS

	MAX	UOM	NOT APPLICABLE
BROMINE			<input checked="" type="checkbox"/>
CHLORINE			<input checked="" type="checkbox"/>
FLUORINE			<input checked="" type="checkbox"/>
IODINE			<input checked="" type="checkbox"/>
SULFUR			<input checked="" type="checkbox"/>
POTASSIUM			<input checked="" type="checkbox"/>
SODIUM			<input checked="" type="checkbox"/>
AMMONIA			<input checked="" type="checkbox"/>
CYANIDE AMENABLE			<input checked="" type="checkbox"/>
CYANIDE REACTIVE			<input checked="" type="checkbox"/>
CYANIDE TOTAL			<input checked="" type="checkbox"/>
SULFIDE REACTIVE			<input checked="" type="checkbox"/>

## HOCs

☒ NONE  
< 1000 PPM  
≥ 1000 PPM

## PCBs

☒ NONE  
< 50 PPM  
≥ 50 PPM

IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?

YES ☒ NO

## ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

## CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS

POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL

☒ NONE OF THE ABOVE





# WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. L339744

## A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #

PAD002312791

GENERATOR NAME:

Sunoco Inc

GENERATOR CODE (Assigned by Clean Harbors)

SU0285

CITY Philadelphia

STATE/PROVINCE PA

ZIP/POSTAL CODE

19137

ADDRESS Margaret and Bermuda Street

PHONE: (215) 807-8442

CUSTOMER CODE (Assigned by Clean Harbors)

SU0285

CUSTOMER NAME:

Sunoco Inc

CITY Philadelphia

STATE/PROVINCE PA

ZIP/POSTAL CODE

19137

## B. WASTE DESCRIPTION

WASTE DESCRIPTION: Spent phenol GC vials

PROCESS GENERATING WASTE:

Lab analysis

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? No

## C. PHYSICAL PROPERTIES (at 25C or 77F)

<b>PHYSICAL STATE</b> <input checked="" type="checkbox"/> SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	<b>NUMBER OF PHASES/LAYERS</b> 1 2 3 TOP 0.00 % BY VOLUME (Approx.) MIDDLE 0.00 BOTTOM 0.00 <b>ODOR</b> NONE <input checked="" type="checkbox"/> MILD STRONG Describe: <b>BOILING POINT °F (°C)</b> ≤ 95 (≤35) 95 - 100 (35-38) 101 - 129 (38-54) ≥ 130 (≥54)	<b>VISCOSITY (If liquid present)</b> 1 - 100 (e.g. Water) 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000 <b>MELTING POINT °F (°C)</b> < 140 (<60) 140-200 (60-93) > 200 (>93)	<b>COLOR</b> Varies <b>TOTAL ORGANIC CARBON</b> ≤ 1% 1-9% <input checked="" type="checkbox"/> ≥ 10%
<b>FLASH POINT °F (°C)</b> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) > 200 (>93)	<b>pH</b> ≤ 2 2.1 - 6.9 7 (Neutral) 7.1 - 12.4 ≥ 12.5	<b>SPECIFIC GRAVITY</b> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) <input checked="" type="checkbox"/> > 1.2 (e.g. Methylene Chloride)	<b>ASH</b> < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0 <b>BTU/LB (MJ/kg)</b> < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) <input checked="" type="checkbox"/> 5,000-10,000 (11.6-23.2) > 10,000 (>23.2) Actual:

## D. COMPOSITION

(List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	--	MAX	UOM
GLASS VIALS	70.0000000	--	80.0000000	%
METAL CAPS	0.0000000	--	10.0000000	%
PHENOL	1.0000000	--	10.0000000	%
PLASTIC	0.0000000	--	5.0000000	%
WATER	1.0000000	--	30.0000000	%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")?

YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM?

YES NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL?

YES NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material.

YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste.

YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS.

YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED.

YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE. G22

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. W409



## E. CONSTITUENTS

Are these values based on testing or knowledge?



Knowledge

Testing

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Lab analysis

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>
<b>VOLATILE COMPOUNDS</b>						
D018	BENZENE	0.5				<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5				<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0				<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0				<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5				<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0				<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5				<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2				<input checked="" type="checkbox"/>
<b>SEMI-VOLATILE COMPOUNDS</b>						
D023	o-CRESOL	200.0				<input checked="" type="checkbox"/>
D024	m-CRESOL	200.0				<input checked="" type="checkbox"/>
D025	p-CRESOL	200.0				<input checked="" type="checkbox"/>
D026	CRESOL (TOTAL)	200.0				<input checked="" type="checkbox"/>
D027	1,4-DICHLOROBENZENE	7.5				<input checked="" type="checkbox"/>
D030	2,4-DINITROTOLUENE	0.13				<input checked="" type="checkbox"/>
D032	HEXACHLOROBENZENE	0.13				<input checked="" type="checkbox"/>
D033	HEXACHLOROBUTADIENE	0.5				<input checked="" type="checkbox"/>
D034	HEXACHLOROETHANE	3.0				<input checked="" type="checkbox"/>
D036	NITROBENZENE	2.0				<input checked="" type="checkbox"/>
D037	PENTACHLOROPHENOL	100.0				<input checked="" type="checkbox"/>
D038	PYRIDINE	5.0				<input checked="" type="checkbox"/>
D041	2,4,5-TRICHLOROPHENOL	400.0				<input checked="" type="checkbox"/>
D042	2,4,6-TRICHLOROPHENOL	2.0				<input checked="" type="checkbox"/>
<b>PESTICIDES AND HERBICIDES</b>						
D012	ENDRIN	0.02				<input checked="" type="checkbox"/>
D013	LINDANE	0.4				<input checked="" type="checkbox"/>
D014	METHOXYCHLOR	10.0				<input checked="" type="checkbox"/>
D015	TOXAPHENE	0.5				<input checked="" type="checkbox"/>
D016	2,4-D	10.0				<input checked="" type="checkbox"/>
D017	2,4,5-TP (SILVEX)	1.0				<input checked="" type="checkbox"/>
D020	CHLORDANE	0.03				<input checked="" type="checkbox"/>
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				<input checked="" type="checkbox"/>
<b>OTHER CONSTITUENTS</b>				<b>MAX</b>	<b>UOM</b>	<b>NOT APPLICABLE</b>
BROMINE						<input checked="" type="checkbox"/>
CHLORINE						<input checked="" type="checkbox"/>
FLUORINE						<input checked="" type="checkbox"/>
IODINE						<input checked="" type="checkbox"/>
SULFUR						<input checked="" type="checkbox"/>
POTASSIUM						<input checked="" type="checkbox"/>
SODIUM						<input checked="" type="checkbox"/>
AMMONIA						<input checked="" type="checkbox"/>
CYANIDE AMENABLE						<input checked="" type="checkbox"/>
CYANIDE REACTIVE						<input checked="" type="checkbox"/>
CYANIDE TOTAL						<input checked="" type="checkbox"/>
SULFIDE REACTIVE						<input checked="" type="checkbox"/>
<b>HOCS</b>				<b>PCBs</b>		
<input checked="" type="checkbox"/> NONE				<input checked="" type="checkbox"/> NONE		
< 1000 PPM				< 50 PPM		
>= 1000 PPM				>=50 PPM		
				IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?		
				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		

## ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

## CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCE

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS

POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL

☒ NONE OF THE ABOVE





**Attachment 3D**  
**Three Years of Manifests Showing Disposal of**  
**“Spent GC Vials” and “Spent Phenol GC Vials”**

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number	
					00158072 FLE	
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)				
Generator's Phone:						
6. Transporter 1 Company Name		U.S. EPA ID Number				
7. Transporter 2 Company Name		U.S. EPA ID Number				
8. Designated Facility Name and Site Address		U.S. EPA ID Number				
Facility's Phone:						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
	1. (SPENT GC VIALS) ER4133					
	2. (SPENT PHENOL GC VIALS) ER4153					
	3. ER4151					
	4. ER4151					
14. Special Handling Instructions and Additional Information						
SOLVENT VIALS PHENOL VIALS VT263 Resin Panel water tank sludge						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name		Signature			Month	Day Year
					10	08 20
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
Transporter signature (for exports only):						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name		Signature			Month	Day Year
Transporter 2 Printed/Typed Name		Signature			Month	Day Year
					10	08 20
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name		Signature			Month	Day Year
					10	08 20

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number	22. Page	23. Manifest Tracking Number		
24. Generator's Name						
25. Transporter _____ Company Name CleanHarbors Environmental Services				U.S. EPA ID Number <b>MAD039322250</b>		
26. Transporter _____ Company Name				U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
		No.	Type			
32. Special Handling Instructions and Additional Information						
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____					
	34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____					
DESIGNATED FACILITY	35. Discrepancy					
	36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b> (Continuation Sheet)		21. Generator ID Number 1602373-177	22. Page 2	23. Manifest Tracking Number 1602373-177	
24. Generator's Name SUNBELT INDUSTRIES					
25. Transporter <u>2</u> Company Name CleanHarbors Environmental Services				U.S. EPA ID Number <b>MAD039322250</b>	
26. Transporter _____ Company Name				U.S. EPA ID Number	
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.
32. Special Handling Instructions and Additional Information					
33. Transporter <u>2</u> Acknowledgment of Receipt of Materials Printed/Typed Name <u>Dr. William J. Belmont (for CHE)</u> Signature <u>[Signature]</u> Month <u>3</u> Day <u>11</u> Year <u>06</u>					
34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____					
35. Discrepancy					
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.



Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Jan 28, 2009

MANIFEST INFORMATION

Generator : Sunoco Chemicals	Manifest Tracking Info.
Address: Margaret and Bermuda Street Philadelphia, PA 19137	002581251FLE
EPA ID #: PAD002312791	Sales Order No: 732210943

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	L37556A	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D001			High TOC Ignitable Liquids	
K022			NONE	

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	L339743	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D001			High TOC Ignitable Liquids	
U002 U055			NONE	

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
3.	1	38669	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
U188			NONE	

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
4.	1	L339744	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
U188			NONE	



Land Disposal Restriction  
Notification Form

Page : 2 of 2

Printed Date : Jan 28, 2009

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1. 2. 3. 4.

Waste analysis data, where available, is attached.

Signature :

*Adrienne DeFelice*

Print Name

*Adrienne DeFelice*

Title :

*Environmental Engineer*

Date :

*1-29-09*



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number PA0003112101		2. Page 1 of 1		3. Emergency Response Phone 800-443-3718		4. Manifest Tracking Number 02003000		FILE		
<b>GENERATOR</b>		5. Generator's Name and Mailing Address Lynch Laboratories Amherst and Farmdale Street Pittsfield, MA 01201 Generator's Phone: (215) 407-8342						Generator's Site Address (if different than mailing address) SAME				
<b>TRANSPORTER</b>		6. Transporter 1 Company Name John Harbors Environmental Services Inc						U.S. EPA ID Number MA00030322250				
		7. Transporter 2 Company Name						U.S. EPA ID Number				
<b>DESIGNATED FACILITY</b>		8. Designated Facility Name and Site Address Clean Harbors El Dorado LLC 209 American Circle El Dorado, AR 71730 Facility's Phone: (370) 883-7173						U.S. EPA ID Number AR0000743132				
<b>INT'L</b>		9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
						No.	Type					
<b>GENERATOR</b>		X		1. HQ, UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., (ACETONE, PHENOL), 3, PG II (D001) (SPENT GC VIALS)		001	DM	00100	P	0001	0002	0055
<b>TRANSPORTER</b>		X		2. HQ, UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S., (ACETONE), 1, 1, PG II (D001)		001	DM	00050	P	0001	0002	
<b>DESIGNATED FACILITY</b>		X		3. HQ, UN3243, WASTE SOLIDS CONTAINING TOXIC LIQUID, N.O.S., (PHENOL, CHROME), 3, 1, PG II (K022)		024	DM	12360	P	8022		
<b>INT'L</b>		X		4. UN3243, WASTE SOLIDS CONTAINING TOXIC LIQUID, N.O.S., (PHENOL), 3, 1, PG II		034 <del>024</del>	DM	12374 <del>12360</del>	P	0188		
14. Special Handling Instructions and Additional Information 1. 630713 AR0120 1755 2. 630659 AR0134 1755 3. 637556 AR0151 1755 4. 6360 AR0151 1755												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offeree's Printed/Typed Name: <u>Paul Persing</u> Signature: <u>Paul Persing</u> Month: <u>3</u> Day: <u>5</u> Year: <u>07</u>												
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____												
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: <u>William Murphy</u> Signature: <u>William Murphy</u> Month: <u>8</u> Day: <u>5</u> Year: <u>09</u> Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____												
18. Discrepancy												
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____												
18b. Alternate Facility (or Generator) U.S. EPA ID Number: _____ Facility's Phone: _____												
18c. Signature of Alternate Facility (or Generator) Month: _____ Day: _____ Year: _____												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. <u>0040</u> 2. <u>0040</u> 3. <u>0040</u> 4. <u>0040</u>												
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____												

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)						21. Generator ID Number PA000231219		22. Page Page 2		23. Manifest Tracking Number 002896090FLF			
24. Generator's Name <div style="background-color: black; width: 100px; height: 1em;"></div>													
25. Transporter _____ Company Name							U.S. EPA ID Number						
26. Transporter _____ Company Name							U.S. EPA ID Number						
		27a. HM			27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			28. Containers		29. Total Quantity	30. Unit WT/Vol.	31. Waste Codes	
					No.		Type						
X					1. UN1244, SOLIDS CONTAINING TOXIC LIQUID, N.O.S., (SULFURIC ACID), PG II			012	DM	02460	P	NONE	
X					2. UN1244, WASTE SOLIDS CONTAINING CORROSIVE LIQD, N.O.S., SODIUM HYDROXIDE) 3, PG II			001	DM	00070	P	D002	
X					3. UN1244, WASTE SOLIDS CONTAINING CORROSIVE LIQUID, N.O.S., SULFURIC ACID, 3, PG II (D002)			005	DF	00450	P	D002	
A					4. UN3077, HAZARDOUS WASTE, SOLID, N.O.S., LEAD, CHROMIUM, 9, PG III (D007 D008)			003	DM	01515	P	D007 D008	
32. Special Handling Instructions and Additional Information BULKY - 12' x 5' S.H. 100# WILL SHIP A. FLAMMABLE - 12' x 5'													
33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year													
34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year													
35. Discrepancy													
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 5 1040     5 1041     7 0142     3 0141													

## Clean Harbors Manifest Addendum

Page:1 of 1

<u>Generator ID Number:</u>		<u>Sales Order Number:</u>	
P A D 0 0 2 3 1 2 7 9 1      002995090FLE		732424928	
Sunoco Chemicals Margaret and Bermuda Street Philadelphia, PA19137			
<u>Line #</u>	<u>Profile No.</u>	<u>Profile Description</u>	<u>Physical State</u> <u>Hazard Code</u> <u>Waste Codes</u>
1.	L339743	SPENT GC VIALS	
		CH Container #	Customer Container #
2.	L38659	ACETONE FILTERS	
		CH Container #	Customer Container #
3.	L37556	PHENOL RESIDUE SLUDGE	
		CH Container #	Customer Container #
4.	38669	VT263 ION EXCHANGE RESIN	
		CH Container #	Customer Container #
5.	L38660	PHENOL FILTER	
		CH Container #	Customer Container #
6.	L38661	CAUSTIC SOLIDS	
		CH Container #	Customer Container #
7.	L39785	SULFURIC ACID DEBRIS	
		CH Container #	Customer Container #
8.	6LID-002	SANDBLASTING SOLIDS	
		CH Container #	Customer Container #

GENERATOR'S INITIAL COPY

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number PA0002312701	22. Page 2 of 2	23. Manifest Tracking Number 702331347E			
24. Generator's Name UNION							
25. Transporter _____ Company Name				U.S. EPA ID Number			
26. Transporter _____ Company Name				U.S. EPA ID Number			
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes	
X	1. UN2822, WASTE PHENOL SOLUTIONS, 3, PG II (SPENT PHENOL GC VIALS)	001	DM	<del>713</del> 228	P	0123	
X	1. UN2715, WASTE AMINES, LIQUID, CORROSIVE, N.O.S., (ISOPHORONEDIAMINE, M XYLENE DIAMINE), 3, PG I	001	DF	<del>713</del> 56	P	0002	
X	1. UN1739, WASTE HYDROCHLORIC ACID SOLUTION, 3, PG II	001	DF	<del>713</del> 130	P	0002	
X	1. UN3244, WASTE SOLIDS CONTAINING CORROSIVE LIQUID, N.O.S., (SODIUM HYDROXIDE), 2, PG II	001	DM	<del>713</del> 124	P	0002	
	2. NONE, WASTE NOT DOT REGULATED MATERIAL, N/A	003	DM	<del>713</del> 1602	P		
32. Special Handling Instructions and Additional Information 7. L37744 ERG#155 1255 7. L37744 1255 6. L37744 ERG#155 1216 7. L37744 ERG#157 1230 8. L37744 ERG#154 1255							
33. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
34. Transporter _____ Acknowledgment of Receipt of Materials Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____							
35. Discrepancy _____							
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 1040 5. 1040 7. 1040 3. 1141 9. 1040							



Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Jul 13, 2010

MANIFEST INFORMATION

Generator : Sunoco Inc

Address: Margaret and Bermuda Street  
Philadelphia, PA 19137

Manifest Tracking Info.

002331442FLE

EPA ID #: PAD002312791

Sales Order No: 632926779-001

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	LCCRD	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

EPA Waste SubCategory

High TOC Ignitable Liquids

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	LCCRD	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

EPA Waste SubCategory

High TOC Ignitable Liquids

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
3.	1	L339743	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

U002U055

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
4.	1	L38662	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D003

U096

EPA Waste SubCategory

Ignitables, except High TOC Liquids

Other reactives

NONE

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
5.	2	L339744	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

U188

EPA Waste SubCategory

NONE



Land Disposal Restriction  
Notification Form

Page : 2 of 2

Printed Date : Jul 13, 2010

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
Phenol	Y	N	N

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
6.	2	LCCRB	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D002			Corrosive Characteristic	

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
7.	2	LCCRA	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D002			Corrosive Characteristic	

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
8.	2	L38661	NON-WASTEWATER	3 (Alternate Debris Standard)
EPA Waste Code			EPA Waste SubCategory	
D002			Corrosive Characteristic	

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1. 2. 3. 4.  
5. 6. 7.

This hazardous debris is subject to the Alternate Treatment Standards of 40 CFR 268.45.

8.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

9.

Waste analysis data, where available, is attached.

Signature :

*Paul Porsing*  
*Kevin Torg*

Print Name

*Paul Porsing*  
*7/14/10*

Title :

Date :

GENERATOR'S INITIAL COMMENTS



GENERATOR'S INITIAL COPY

**Clear Mark, at less than spot prices, permits to and will accept the weight for patients & shipping.**



Land Disposal Restriction  
Notification Form

Page : 1 of 3

Printed Date : Sep 27, 2010

MANIFEST INFORMATION

Generator : Sunoco Inc

Address: Margaret and Bermuda Street  
Philadelphia, PA 19137

EPA ID #: PAD002312791

Manifest Tracking Info.

003397417FLE

Sales Order No: 733107210

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	L339743	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

U002U055

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	L37557	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

U055

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
3.	1	L38662	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D003

U096

EPA Waste SubCategory

Ignitables, except High TOC Liquids

Other reactives

NONE

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
4.	1	L339744	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

U188

EPA Waste SubCategory

NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
Phenol	Y	N	N



# Land Disposal Restriction Notification Form

Page : 2 of 3

Printed Date : Sep 27, 2010

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
6.	2	L38661	NON-WASTEWATER	3 (Alternate Debris Standard)

EPA Waste Code

D002

EPA Waste SubCategory

Corrosive Characteristic

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
7.	2	CH127448	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D018

EPA Waste SubCategory

NONE

## LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ANTHRACENE	Y	N	N
BENZ (A) ANTHRACENE	Y	N	N
BENZO (A) PYRENE	Y	N	N
BENZO (B) FLUORANTHENE	Y	N	N
BENZO (K) FLUORANTHENE	Y	N	N
CHRYSENE	Y	N	N
FLUORENE	Y	N	N
INDENO (1,2,3-C,D) PYRENE	Y	N	N
NAPHTHALENE	Y	N	N
PHENANTHRENE	Y	N	N
TOLUENE	Y	N	N
XYLENES (MIXED ISOMERS)	Y	N	N



Land Disposal Restriction  
Notification Form

Page : 3 of 3

Printed Date : Sep 27, 2010

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1. 2. 3. 4.  
7.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

5.

This hazardous debris is subject to the Alternate Treatment Standards of 40 CFR 268.45.

6.

Waste analysis data, where available, is attached.

Signature :

Adrienne Blanchard

Print Name

Adrienne Blanchard

Title :

Environmental Engineer

Date :

9/29/2010

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number PA 00012411791	2. Page 1 of 1	3. Emergency Response Phone 800 422 7111	4. Manifest Tracking Number 003917352 FLE		
5. Generator's Name and Mailing Address Carnegie Inc. 14400 and 14400 Street Philadelphia, PA 19112 Generator's Phone: 215 307 8442		Generator's Site Address (if different than mailing address) 14400					
6. Transporter 1 Company Name Clean Horizons Environmental Services Inc.				U.S. EPA ID Number PA 00019422350			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Clean Horizons El Dorado LLC 501 American Circle El Dorado, AR 71730 Facility's Phone: 870 363 7171				U.S. EPA ID Number AR 0000744122			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, WATER, ETHYL, PG II)	003	DM	01110	P	0001 1005
	X	2. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. (ACETONE, PHENOL), 3, PG II, (GC VIALS) (SPENT GC VIALS)	001	DM	00150	P	0001 0002 0035
	X	3. UN3110, WASTE ORGANIC PEROXIDE TYPE F, SOLID, (TOLUENE HYDROGEN PEROXIDE), 3, PG II	009	DM	01800	P	0001 0003 1038
	X	4. UN2810, WASTE TOXIC LIQUIDS, ORGANIC, N.O.S. (PHENOL, ACETOPHENONE), 3, PG II	004	DM	00400	P	1022
14. Special Handling Instructions and Additional Information 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993 1.1. 1993							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Officer's Printed/Typed Name: <u>Mark A. Smith</u> Signature: <u>[Signature]</u> Month: <u>10</u> Day: <u>30</u> Year: <u>11</u>							
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ Transporter signature (for exports only): _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: _____ Signature: _____ Month: <u>10</u> Day: <u>27</u> Year: <u>11</u> Transporter 2 Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____						
	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____						
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) Month: _____ Day: _____ Year: _____						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. <u>100000</u> 2. <u>100000</u> 3. <u>100000</u> 4. <u>100000</u>						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: _____ Signature: _____ Month: _____ Day: _____ Year: _____							





ENVIRONMENTAL SERVICES®

## MANIFEST INFORMATION

Land Disposal Restriction  
Notification Form

Page: 1 of 3

Printed Date: Mar 09, 2011

Generator: Sunoco Inc

Address: Margaret and Bermuda Street  
Philadelphia, PA 19137

EPA ID #: PAD002312791

Manifest Tracking Info.

003917962FLE

Sales Order No: 633394658-001

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	L37557	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

U055

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	L339743	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

U002U055

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
3.	1	L38662	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D003

U098

EPA Waste SubCategory

Ignitables, except High TOC Liquids

Other reactives

NONE

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
4.	1	L37558	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

K022

EPA Waste SubCategory

NONE

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
5.	2	L37560	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

U138

EPA Waste SubCategory

NONE



# Land Disposal Restriction Notification Form

Page : 2 of 3

Printed Date : Mar 09, 2011

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
3.	2	CH12050	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
K022			NONE	

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
7.	2	L330319	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D007			Toxicity Characteristic for Chromium	
D008			Toxicity Characteristic for Lead	

## LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
Chromium	Y	N	N
LEAD	Y	N	N

## LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
8.	2	L339744	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
U188			NONE	

## LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
Phenol	Y	N	N





Land Disposal Restriction  
Notification Form

Page: 3 of 3

Printed Date: Mar 09, 2011

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1. 2. 3. 4.  
5. 6. 7. 8.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

9. 10.

Waste analysis data, where available, is attached.

Signature: 

Print Name

MARK SWARTZEL

Title:

ENV. ENGINEER

Date:

3/9/11

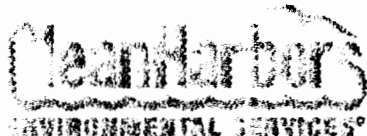
**Attachment 4A**  
**Three Years of Manifests Showing Disposal of**  
**Lead-Acid Batteries**



SHIPPING DOCUMENT		1. Generator ID Number 230002342701	2. Page 1 of 2	3. Emergency Response Phone (973) 347-1509	4. Shipping Document Tracking Number <b>ZZ 00141831</b>	
5. Generator's Name and Mailing Address DUNOCO CHEMICALS MARGARET B. BERMLUDA PHILADELPHIA, PA 19117			6. Generator's Site Address (if different than mailing address) SAME			
7. Generator's Phone: 215-807-3442						
8. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS			U.S. EPA ID Number NJ 00000631200			
9. Transporter 2 Company Name			U.S. EPA ID Number			
10. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS LLC 1 EDEN LANE CLANDERS, NJ 07826			U.S. EPA ID Number NJ 00000631200			
Facility's Phone: 973-347-1509						
GENERATOR	11a. HM	11b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	12. Containers No. Type	13. Total Quantity	14. Unit Wt./Vol.	15. Codes
	X	UN2794, BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, III	001 DF	00045	P	NONE
	X	UN2809, MERCURY CONTAINED IN MANUFACTURED ARTICLES, 8, III	001 DF	00005	P	NONE
	X	UN2795, BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, III	001 DF	00025	P	NONE
	X	UN3090, LITHIUM BATTERY, 9, II	001 DF	00010	P	NONE
16. Special Handling Instructions and Additional Information 1) W:321516 A:AERC13931-LEADZ LEAD ACID BATTERIES- UNIVERSAL WASTE 2) W:321228 A:AER000783NJ MERCURY APPARATUS 3) W:999362 A:AERC13931-NICAD NI CAD BATTERIES- UNIVERSAL WASTE 4) W:50721 A:AERC13931-LITHZ LITHIUM BATTERIES- UNIVERSAL WASTE - ER Service Contracted by VESTS REC'D 11-5-08						
17. GENERATOR S/OFFEROR S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.						
Generator's/Officer's Printed/Typed Name X Paul Reversing		Signature <i>Paul Reversing</i>		Month Day Year 10/14/08		
TRANSPORTER	18. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____					
	19. Transporter Acknowledgment of Receipt of Shipment Transporter 1 Printed/Typed Name DAN BARSZCZ Signature <i>Dan Barszcz</i> Month Day Year 10/14/08 Transporter 2 Printed/Typed Name Signature Month Day Year					
DESIGNATED FACILITY	20. Discrepancy 21a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Shipping Document Tracking Number: _____					
	21b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: _____					
	21c. Signature of Alternate Facility (or Generator) Month Day Year					
	22. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems) 1. H141 2. H141 3. H141 4. H141					
23. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in item 18a Printed/Typed Name William Ricks Signature <i>William Ricks</i> Month Day Year 10/17/08						

SHIPPING DOCUMENT (Continuation Sheet)		21. Generator ID Number P A 0 0 0 2 3 1 2 7 0 1	22. Page 2 of 2	23. Shipping Document Tracking Number <b>ZZ00141331</b>			
24. Generator's Name DUNOCO CHEMICALS							
25. Transporter _____ Company Name				U.S. EPA ID Number			
26. Transporter _____ Company Name				U.S. EPA ID Number			
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit Wt./Vol.	31. Codes	
		No.	Type				
	5. ALKALINE BATTERIES, DOT NON-REGULATED	001	DF	00040	P	NONE	
	6. UNIVERSAL WASTE-LAMPS	002	DF	00110	P	NONE	
	7. UNIVERSAL WASTE-LAMPS	003	CF	00045	P	NONE	
	8. UNIVERSAL WASTE-LAMPS	002	DF	00050	P	NONE	
32. Special Handling Instructions and Additional Information 5) W:682405 A:AERC13931-ALKZ ALKALINE BATTERIES- UNIVERSAL WASTE 6) W:323232 A:FL004127-4 FLUORESCENT LAMPS- UNIVERSAL WASTE 7) W:323232 A:FL004127-U U-TUBES- UNIVERSAL WASTE 8) W:323232 A:FL004127-U U-TUBES- UNIVERSAL WASTE							
TRANSPORTER	33. Transporter _____ Acknowledgment of Receipt of Shipment						
	Printed/Typed Name			Signature		Month	Day
TRANSPORTER	34. Transporter _____ Acknowledgment of Receipt of Shipment						
	Printed/Typed Name			Signature		Month	Day
DESIGNATED FACILITY	35. Discrepancy						
	36. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)						
	<div style="display: flex; justify-content: space-around; font-size: 2em;"> <span>H141</span> <span>H141</span> <span>H141</span> <span>H141</span> </div>						

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number		
					02305066 FLE		
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)					
Generator's Phone:							
6. Transporter 1 Company Name		U.S. EPA ID Number					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address		U.S. EPA ID Number					
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
x	1. HAZARDOUS WASTE MATERIALS, UNIDENTIFIED, IN CONTAINERS	001	DR	00100	0	0002	0004
x	2. HAZARDOUS WASTE MATERIALS, UNIDENTIFIED, IN CONTAINERS	001	CV	00100	0		
	3.						
	4.						
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name		Signature			Month Day Year		
16. International Shipments		<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.			Port of entry/exit: Date leaving U.S.:		
Transporter signature (for exports only):							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name		Signature			Month Day Year		
Transporter 2 Printed/Typed Name		Signature			Month Day Year		
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 11111		2. 11111		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature			Month Day Year		



Land Disposal Manifest  
Notification Form

Page: 1 of 1

Printed Date: Sep 02, 2009

MANIFEST INFORMATION

Generator: Sunoco Chemicals

Address: Margaret and Bermuda Street  
Philadelphia, PA 19137

EPA ID #: PAD0002312791

Manifest Tracking Info.

002085026FLE

Sales Order No: 632473341-001

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	UBLA2	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code				EPA Waste SubCategory
0002				Corrosive Characteristic
0008				Lead Acid Batteries

Certification

Applies to  
Manifest Line  
Items

Pursuant to 40 CFR 268.7(a), I hereby certify that this shipment contains waste restricted under 40 CFR Part 268.

1.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

2.

Waste analysis data, where available, is attached.

Signature:

Print Name

Title:

Date:

Paul Pexano  
9/3/09

01/27/2009

Files Order Packet: EPA/RC41-01 Date: 05/02/2009

Order: 7C00000611

Created By: BREK301

Container ID #

Trailer: 13L32

Feedback Comment:

GENERATOR		DESIGNATED FACILITY	
Generator Code:	LU0205	Facility Code:	AL
Generator EPA ID #:	PA00002312291	Facility EPA ID #:	AR00009748192
Generator Name:	Sunoco Chemicals	Facility Name:	Clean Harbors El Dorado LLC
Address:	Margaret and Bermuda Street	Address:	109 American Circle
	Philadelphia, PA 19137		El Dorado, AR 71730
Phone:	(215) 607-8442	Phone:	(870) 863-7173

MANIFEST

Manifest Tracking #: 002005006FLE Container Type/Description: 16DF 16 gallon drum

Manifest Page #: 1

Manifest Line #: 1 Shipping Quantity: 35 Pounds

DOT Shipping Name: UN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 3, PG III

Item #	Substance	Waste Codes	Qty	Size	L/S/G
1000000034	Leaking lead acid battery (100.00%)	D002, D008	35 Pounds	3.000	Solid

10/1/2013

CONTAINER

Order Order Trk # 302478011 001 Date: 08/02/2009

EPA

0000006612

Created By: MEERSJI

Customer ID #

Product#

0000006612

Labpack Comment:

GENERATOR		DESIGNATED FACILITY	
Generator Code:	SL0285	Facility Code:	SL
Generator EPA ID #	PAD000012791	Facility EPA ID #	AR00069718792
Generator Name:	Sunoco Chemicals	Facility Name:	Clean Harbors El Dorado LLC
Address:	Margaret and Bermuda Street Philadelphia, PA 19137	Address:	209 American Circle El Dorado, AR 71720
Phone:	(215) 307-2442	Phone:	(870) 263-7173

MANIFEST

Manifest Tracking #: 002095096FILE Container Type/Description: 150F 16 gallon drum

Manifest Page #: 1

Manifest Line #: 1. Shipping Quantity: 35 Pounds

DOT Shipping Name: UN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 3, PG III

Item #	Substance	Waste Codes	Qty	Size	L/S/G
0000000035	Leaking lead acid battery (100.00%)	D002, D008	35 Pounds	0.000	Solid



UNIT: MEG

Order/Order Task #: 002178341/001 Date: 06/02/2009

LP #: 0000005610

Created By: MEEPS001

Customer LP #: 1

Product: 1BLA2

Labpack Comment:

GENERATOR		DESIGNATED FACILITY	
Generator Code:	000265	Facility Code:	LL
Generator EPA ID #:	PA00002312791	Facility EPA ID #:	AR00060748102
Generator Name:	Sunoco Chemicals	Facility Name:	Clean Harbors El Dorado LLC
Address:	Margaret and Bermuda Street Philadelphia, PA 19137	Address:	109 American Circle El Dorado, AR 71730
Phone:	(215) 607-6442	Phone:	(370) 263-7173

**MANIFEST**

Manifest Tracking #: 002006096FLE Container Type/Description: USDF 5 gallon plastic/fiber pail

Manifest Page #: 1

Manifest Line #: 1 Shipping Quantity: 15 Pounds

DOT Shipping Name: UN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 8, PG III

Item #	Substance	Waste Codes	Qty	Size	LS/G
0000000033	Leaking lead acid battery (100.00%)	0002, 0003	15 Pounds	0.000	Solid

CONTAINER

Order Order Task #: 02475241-001 Date: 09/02/2009

LP #: 000006608

Created By: MEERSOJ

Customer LP #:

Product: UBLX2

Labpack Comment:

GENERATOR		DESIGNATED FACILITY	
Generator Code:	EUR665	Facility Code:	AL
Generator EPA ID #:	PAC002312791	Facility EPA ID #:	ARD069748192
Generator Name:	Brunco Chemicals	Facility Name:	Clean Harbors El Dorado LLC
Address:	Margaret and Bermuda Street Philadelphia, PA 19137	Address:	309 American Circle El Dorado, AR 71720
Phone:	(215) 607-2442	Phone:	(870) 863-7173

MANIFEST

Manifest Tracking #: 02595008FLE Container Type/Description: 55DF 5 gallon plastic/fiber pail

Manifest Page #: 1

Manifest Line #: 1 Shipping Quantity: 15 Pounds

DOT Shipping Name: UN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 8, PG II

Item #	Substance	Waste Codes	Qty	Size	LS/G
000000031	Leaking lead acid battery (100.00%)	D002, D009	15 Pounds	1 000	Solid

CONTAINER

Manifest Order Tracking #: 02476241-001 Date: 09/03/2009  
Created By: R-GERSON

LP #: 0000006609  
Customer LP #: 0000006609  
Provider: 1 BLA2

Package Comment:

GENERATOR		DESIGNATED FACILITY	
Generator Code:	9-00255	Facility Code:	EL
Generator EPA ID #:	PAD0002310791	Facility EPA ID #:	ARC069748102
Generator Name:	Quinceo Chemicals	Facility Name:	Clean Harbors El Dorado LLC
Address:	Margaret and Bermuda Street Philadelphia, PA 19137	Address:	109 American Circle El Dorado, AR 71730
Phone:	(215) 607-6442	Phone:	(870) 663-7173

MANIFEST

Manifest Tracking #: 002995096ELE Container Type/Description: 55DF 5 gallon plastic/fiber pail

Manifest Page #: 1

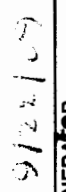
Manifest Line #: 1 Shipping Quantity: 15 Pounds

DOT Shipping Name: LN2794, WASTE BATTERIES, WET, FILLED WITH ACID, 8, PG III

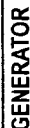
Item #	Substance	Waste Codes	Qty	Size	US/G
0000000032	Leaking lead acid battery (100.00%)	0002, 10008	15 Pounds	0.000	Solid

TRANSPORTER

GENERATOR / SHIPPER'S INITIAL COPY

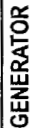


GENERATOR / SHIPPER'S INITIAL COPY

TRANSPORTER INT'L

Red 12/16/09

GENERATOR / SHIPPER'S INITIAL COPY

TRANSPORTER

GENERATOR / SHIPPER'S INITIAL COPY

<b>SHIPPING DOCUMENT</b>		1. Generator ID Number 200 0023121515	2. Page 1 of 2	3. Emergency Response Phone 477 413 4137	4. Shipping Document Tracking Number <b>ZZ 00203477</b>			
5. Generator's Name and Mailing Address ORICO CHEMICALS MARGARET & HERMUDA PHILADELPHIA, PA 19117								
Generator's Site Address (if different than mailing address) SAME								
Generator's Phone: 477 413 4137								
6. Transporter 1 Company Name VEOLIA ENVIRONMENTAL SOLUTIONS				U.S. EPA ID Number N10030431350				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address VEOLIA ENVIRONMENTAL SOLUTIONS, LLC 5100 HEDLEY STREET PHILADELPHIA, PA 19117				U.S. EPA ID Number P30231215157				
Facility's Phone: 200 0023121515								
<b>GENERATOR</b>	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Codes	
	X	1. UN2794, BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 3, III		001 CF	40	P	NONE	
	X	2. UN2794, BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 3, III		001 DF	48	P	NONE	
		3. UNIVERSAL WASTE LAMPS		00173 DF	52	P	NONE	
		4. UNIVERSAL WASTE LAMPS		001 CF	13	P	NONE	
14. Special Handling Instructions and Additional Information 1) W321516 A: AERC13931-LEAD/LEAD ACID BATTERIES 2) W321516 A: AERC13931-LEAD/LEAD ACID BATTERIES 3) W323232 A: FLO04127-4 4' FLUORESCENT LAMPS 4) W323232 A: FLO04127-4 4' FLUORESCENT LAMPS 5) CR Service Contracted by VESTS								
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.								
Generator's/Officer's Printed/Typed Name Adrianne Stinchard				Signature Adrianne Stinchard		Month Day Year 12/16/10		
<b>INT'L</b>	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
	17. Transporter Acknowledgment of Receipt of Shipment							
<b>TRANSPORTER</b>	Transporter 1 Printed/Typed Name Michael Romano				Signature Michael Romano		Month Day Year 12/16/10	
	Transporter 2 Printed/Typed Name				Signature		Month Day Year	
<b>DESIGNATED FACILITY</b>	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Shipping Document Tracking Number: _____							
	18b. Alternate Facility (or Generator) U.S. EPA ID Number							
	Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a								
Printed/Typed Name				Signature		Month Day Year		





## GENERATOR

TRANSPORTER

DESIGNATED FACILITY

<b>SHIPPING DOCUMENT</b>		1. Generator ID Number 1111111111111111	2. Page 1 of 2	3. Emergency Response Phone 1-800-441-3047	4. Shipping Document Tracking Number <b>ZZ 00133135</b>			
5. Generator's Name and Mailing Address UNOCO CHEMICALS MARGARET & BERMUDA PHILADELPHIA, PA 19137				Generator's Site Address (if different than mailing address) SAME				
Generator's Phone: 215-407-8453				U.S. EPA ID Number PA10030431332				
6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS, LLC 3100 HEDLEY STREET PHILADELPHIA, PA 19137				U.S. EPA ID Number PA10030431332				
Facility's Phone: 800-422-2342								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Codes		
		No.	Type					
X	1. UN2794, BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 3, III	001	CF	01700	P	NONE		
	2. UNIVERSAL WASTE MERCURY CONTAINING LAMPS	001	DF	00020	P	NONE		
	3. UNIVERSAL WASTE LAMPS	001	DF	00010	P	NONE		
	4. UNIVERSAL WASTE LAMPS	001	DF	00020	P	NONE		
14. Special Handling Instructions and Additional Information FL004127-4 1) W:321516 A:AEERC13931-LEADZ 2) W:306008 A:HD01315NJ 3) W:323232 A: (U-TUBES) ER Service Contracted by VESTS (4' FLUOR)								
15. GENERATOR S/OFFEROR S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.								
Generator's/Offor's Printed/Typed Name Mark A. Switzer				Signature 		Month Day Year 10 13 10		
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: _____ Date leaving U.S.: _____					
	Transporter signature (for exports only):							
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Shipment		Signature		Month Day Year			
	Transporter 1 Printed/Typed Name Eve Carahayre				10 13 10			
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name		Signature		Month Day Year			
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
Shipping Document Tracking Number: _____								
18b. Alternate Facility (or Generator) U.S. EPA ID Number								
Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Report Management Method Codes (i.e., codes for treatment, disposal, and recycling systems)								
1. _____			2. _____			3. _____		
4. _____								
20. Designated Facility Owner or Operator: Certification of receipt of shipment except as noted in Item 18a								
Printed/Typed Name				Signature		Month Day Year		

GENERATOR'S INITIAL COPY

Form Approved. OMB No. 2050-0039

3/20/2011  
GENERATOR

John Martineau has the appropriate permits for and will accept the waste the generator is collecting.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>12345</b>	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number <b>02922013 FLE</b>			
5. Generator's Name and Mailing Address <b>Union Inc Margaret and Belmont Street Philadelphia, PA 19137</b>			Generator's Site Address (if different than mailing address) <b>same</b>					
6. Transporter 1 Company Name <b>John Harbors Environmental Services Inc</b>			U.S. EPA ID Number <b>PA4301032253</b>					
7. Transporter 2 Company Name			U.S. EPA ID Number					
8. Designated Facility Name and Site Address <b>Spring Grove Resource Recovery Inc 1579 Spring Grove Avenue Cincinnati, OH 45232</b>			U.S. EPA ID Number <b>OH000016621</b>					
Facility's Phone: <b>5136813128</b>								
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
	x	1. UN244, WASTE SOLIDS CONTAINING CORROSIVE LIQUID, N.O.S. (SODIUM HYDROXIDE), 3, PG II	1	DM	100	P	0002	
	x	2. UN280, BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 3, PG III	23	CF	1514	P		
		3.						
		4.						
14. Special Handling Instructions and Additional Information <b>1. 100% UN244 100% UN280 2. 25 Lead Acid Batteries in 1 pallet.</b>								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offor's Printed/Typed Name <b>MARY A. SWEITZEL</b>			Signature 			Month Day Year <b>05 25 11</b>		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:					
	Transporter signature (for exports only):							
	17. Transporter Acknowledgment of Receipt of Materials							
	Transporter 1 Printed/Typed Name <b>Tom Lowe</b>		Signature 			Month Day Year <b>05 25 11</b>		
	Transporter 2 Printed/Typed Name		Signature			Month Day Year		
DESIGNATED FACILITY	18. Discrepancy							
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
	Manifest Reference Number:							
	18b. Alternate Facility (or Generator)			U.S. EPA ID Number				
	Facility's Phone:							
	18c. Signature of Alternate Facility (or Generator)			Month Day Year				
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
	1. <b>1111</b>	2. <b>1111</b>	3.	4.				
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
	Printed/Typed Name			Signature			Month Day Year	



Land Disposal Restriction  
Notification Form

Page: 1 of 1

Printed Date: May 25, 2011

ENVIRONMENTAL SERVICES®

MANIFEST INFORMATION

Generator: Sunoco Inc

Address: Margaret and Bermuda Street  
Philadelphia, PA 19137

Manifest Tracking Info.

002922948FLE

EPA ID #: PAD002312791

Sales Order No: 703513636

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	L38661	NON-WASTEWATER	3 (Alternate Debris Standard)

EPA Waste Code

0002

EPA Waste SubCategory

Corrosive Characteristic

Certification

Applies to  
Manifest Line  
Items

This hazardous debris is subject to the Alternate Treatment Standards of 40 CFR 268.45.

1.

This waste is not restricted as specified in 40 CFR 268 Subpart D.

2.

Waste analysis data, where available, is attached.

Signature:

Print Name

MARK A. SWEITZER

Title:

ENV. ENGINEER

Date:

5-25-2011